

29 May 2018

From: Scott Cragg
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To: TCA – PRPD

Subj: Trip Report: Crystal Reef, LLC, On-Site Visit to PRPD, May 20-22, 2018
in support of USDOJ Consent Decree; Agreement for the Sustainable
Reform of the PRPD

Attachment: (1) Scott Cragg Assessment; Puerto Rico Police Department -
Kronos Time Keeping System, January 2018.

The primary and sole objective of this site visit was to review the status of current Kronos operations and development of the overtime module.

Background; The US Department of Labor sued PRPD and prevailed leading to Consent Judgment; Case 3:16-cv-02849-CCC Document 4-1, Filed 10/19/16. Summarizing, PRPB is to comply with the Fair Labor Standards Act and amongst other terms, compensate agents for overtime worked and implement an electronic time keeping system. At the time of said Decree, PRPD used Kronos for “base pay” time and attendance. However, overtime pay, compensatory time, special pay, etc. was not tracked within Kronos. A manual paper process had been implemented and continues as of 22 May. In an effort to comply PRPD contracted with a company (Interboro) for an overtime module solution.

To determine the status of PRPD’s efforts to comply with Court Order; Case 3:12-cv-02039-GAG Document 700 Filed 01/13/18, the Federal Monitor assigned Mr. Scott Cragg (Subject Matter Expert for Information and Technology) to perform a cursory assessment of Puerto Rico Police Departments existing time and attendance (T&A) processes and IT equipment between January 22 and 25, 2018. Interviews were conducted with Puerto Rico Police Department HR, Bureau of Technology and Reform staff, IT support staff at the Guayama Comandancia, and with the HR contactor (Interboro) performing the IT development. The purpose of the assessment was to establish a baseline from which to make initial recommendations regarding “way forward” options for PRPD to develop a world class time keeping system for Puerto Rico Police Department. A “cursory report” was submitted and is appended to this trip report as Attachment (1).

During a Teleconference in April between Parties, PRPD the USDOJ and TCA agreed that an assessment should again be conducted between May 20-22, 2018 to determine the status of Kronos operations and development of the

overtime module, and to again make recommendations to PRPD for proceeding with their efforts to comply with the Time & Attendance Consent Order.

Observations; During the on-site visit 20-22 May 2018, The TCA asked that the following be targeted for assessment if possible;

- 1) Schedule, resources required.
- 2) How are they executing?
- 3) How are they testing?
- 4) Progress of OT pilot during 20-21 May visit.
- 5) Lessons learned during the pilot.
- 6) Supervisory adherence,
- 7) Status of policies, GO's and training associated with Kronos.

The following summarizes observations of on-site Puerto Rico meetings and reviews during May 20-22, 2018.

Meeting were conducted on-site between Mr. Cragg and the following stakeholders; CIO Juan Carlos Rivera, Angel Diaz, Dario Miranda, Associate Commissioner for Administration Sandra Clemente, Vivian Napoleon, (Director) Human Resources with two (2) other representatives, Lt Jenny Lopez all PRPD and Sarah Lopez of US DOJ.

The following observations were made during meetings;

- Interboro continues to develop the OT Module under the supervision of Lt Jenny Lopez
- Lt Lopez states that Interboro is on track to complete development Work by approximately 21 June although their contract is set to expire on or about 30 June 2018
- The contract expiration on 30 June would not allow adequate time for revision, correction or modification of the Kronos OT module
- CIO Rivera has offered to staff an extension of the contract with Interboro at no cost
- With regard to time & attendance, generally speaking, PRPD staff do not trust;
 - Kronos data or equipment
 - Kronos processes
 - PRPD supervision
- Kronos processing and slow response times experienced by users is unacceptable. However the CIO states that this problem is as a result of PRPD leadership scoping Kronos timekeeping data review and reach back to go span several years which when kept "open" causes the data bases to unnecessarily retrieve data going backwards and slow or "bog down" Kronos response times.

- Given lack of the Overtime Module, procedurally Form PPR-432 is continuing to be used to record and submit OT hours which is more likely to introduce human error in the data
- No evidence was provided with respect to institutional availability of Kronos Training
- Kronos equipment has been damaged or vandalized
- Fiber connectivity needed for transmission of data to HQ is still unreliable
- Yahaira stated that USDOL and PRPB jointly agreed to be responsible for joint training (12-13 sessions) for OT time keeping. She also claimed 2000 people don't want to use Kronos, and also claimed timeout issues with the application and the punch units which didn't always work
- From the evidence seen of Form PPR-432 backlogs, it appears Supervisors are continuing to submit OT requests. Extensive in person reviews would be required to estimate broad adherence of supervisors with respect to approving and submitting OT requests
- Process owners from the Overtime Office who prepare Form PPR-432 (Vivian Napoleon and Yvonne Rosario) claim that the Interboro pilot doesn't have all the data that the virtual PPR-432 must include
- T&A process owners claim that Interboro has only met with their offices 2-3 times/year over the last 4 years.
- The General Order is not yet finalized
- The Overtime module project was broken into 7 phases. Phases 1-4 are completed and comments have been asked for from HR and the Overtime office. Lt Lopez submits that she has not received comments back on the module. The Overtime Office disagrees with this position and states that the last set of recommendations to Interboro was released by 16 March 2018 from Ms. Clemente. Vivian has not been informed of an evaluation date following Interboro delivery and has no confidence that Interboro will deliver a functioning module.
- Phase 5 testing is to occur 5/21-6/2/2018
- Phase 6 development is partially delivered
- Phase 7 delivery was to be completed on 29 May and tested 5/29-6/8

Recommendations: Given the current timing of the Kronos contract for the Overtime Module the following recommendations should be considered given the risk of not staying the course and plan;

- 1) Interboro should be compelled to complete its work on the Module
- 2) A no cost extension should be executed such that technical expertise is available to correct or revise the OT module after delivery
- 3) User Acceptance test should proceed as planned and all lessons learned should be captured and documented
- 4) All contract terms, actions and corrections to implement OT functionality should be enforced
- 5) Training must be completed
- 6) The General Order and Policies must be completed

- 7) Because experienced project management subject matter experts for technology efforts are not readily on staff at PRPD and available, an independent contract should be considered to hire “third party” project management and quality assessment experts to ensure that organizations are following project management principles to reduce risks to successful implementations of IT. CIO had stated that a similar request had been submitted formally but that it was cancelled by PRPD leadership this year.

Summary - Effectively it is too late in the development life cycle to discontinue Interboro’s efforts. Doing so would relieve Interboro from accountability and increase the risk to PRPD with regard to finishing this effort itself or with another development company.

Observation: All process stakeholders in this project including the Overtime Division, HR Division, Bureau of Technology, Training, appropriate leadership offices, etc. should be held collectively accountable for success of the development, piloting, revision, training and implementation. “Finger Pointing” and blaming as it is occurring currently will not amount to delivery of an automated OT solution. Clearly there is no unity between PRPD’s responsible offices which has led to collective dissent and a lack of support for common success and interests. Under these circumstances it is likely that any IT project will experience delays and disagreements concerning functionality, features and usability leading to failure. Committed, disciplined and harmonious supervision and management is essential to success of this project and others like it.

In final, the recommendations made in the cursory report filed in January remain relevant. There is no substitute for experienced project management and without a cadre of project managers who are effectively trained and available PRPD will continue to struggle without enough knowledgeable staff.

Attachment (1)

Assessment; Scott Cragg Assessment; Puerto Rico Police Department - Kronos Time Keeping System, January 2018.

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INTRODUCTION:

Pursuant to Court Order in Case 3:12-cv-02039 (GAG), Docket No. 700, filed 01/13/18, the Technical Compliance Advisor assigned Mr. Scott Cragg (Information Technology SME for TCA) to perform a cursory assessment of Puerto Rico Police Departments existing Time and Attendance, hereinafter T&A, processes and processing equipment between January 22 and 25, 2018.

PURPOSE OF ASSESSMENT AND METHODOLOGY:

Interviews were conducted with Puerto Rico Police Department HR, Bureau of Technology and Reform staff, IT support staff at the Comandancia Guayama and with the HR contractor (Interboro) performing IT development. The purpose of the Assessment is to establish a baseline from which to make initial recommendations regarding a way forward for PRPD to develop a world class time keeping system for Puerto Rico Police Department.

Initial observations:

Puerto Rico Police Department currently employs a Time & Attendance information technology system (Kronos) for time keeping. Given its present capabilities, employees use the system to record arrival and departure from their duty stations utilizing a thumb print reading clock connected via the internet to a Headquarters server that processes the data. Unfortunately at this time, as result of the hurricanes and damage to fiber networks Kronos is not 100% available to Puerto Rico Police Department staff. When functioning, total hours worked are recorded and used to calculate "regular" attendance hours for the purpose of computing base pay. **Although total hours collected could reconcile overtime hours in excess of regular hours, the PRPD does not currently use the feature.** And so although the T&A system is currently being adapted to incorporate additional capabilities, workaround manual processes are used that require manual supervisory involvement to validate and approve T&A. An example of this is manual use of hard copy Form PPR-432 to record, approve and submit overtime hours worked. **Observation:** This process is inefficient, can be cumbersome, is not timely and deviates from what should be a computer or

smartphone enabled “end to end” timekeeping workflow similar to those found in many Federal Agencies.

Additional Issues:

Complicating issues surrounding time keeping include the following:

1. network disconnects due to the hurricanes
2. de-coupled training from the development schedule of Kronos
3. failure of supervision to adequately ensure that time keeping procedures are followed and
4. incomplete training.

Opportunity:

To fully comply with the mandate of Hon. Gustavo A. Gelpi, U.S.D.J., Puerto Rico Police Department is in a position to revise its workflows and technology tools to dramatically improve time keeping processes. These could include methods such as incorporating cloud service providers of time keeping records and broader deployment of mobile smartphone applications and web tools, etc.

Recommended Course of Action:

1. Complete the current PPR-432 development phase to digitally replace form PPR-432, perform testing, suspend further development and gather lessons learned.
2. Prepare an Analysis of Alternatives (AOA) and rough order magnitude resource and cost estimates to perform items 2-4 below. To accomplish this task, subject matter expert resources should be applied to complete this step 2: Estimated resources needed - Project Lead and Solution Architect 120 Hours, deliver AOA no later than 6 weeks after approval to start. This is a required planning step necessary to understand options.
3. If the AOA is accepted, further develop the step 2 alternatives into a comprehensive project plan incorporating lessons learned from prior experiences with Kronos. Consideration must be given to a Cloud Service implementation of time and attendance “punch”, supervisory review, HR and Payroll processing through a fully digital process that also incorporates mobile and fixed “clock punch” tools such as smart phones. This project plan must include a projection of estimated resources to implement, a procured service which Puerto Rico Police Department does not have to maintain itself and which it could benefit from by not having to procure IT infrastructure or processing equipment. This planning must result in an advanced technology architecture for T&A. Cost and Schedule

to be estimated after step 2 and before step 3 start. This step requires review and approval. This is a planning step.

4. If step 3 is approved, implement the project plan option to re-design T&A processes for staff and supervision. This step requires approval and a commitment of budget resources and staff. Cost and schedule to be calculated after step 3. This is an implementation step where the majority effort and cost will be incurred.
5. Operationalize the future state "Cloud" solution for delivery of T&A. This step requires approval and budget resources. This will be an implementation step that requires recurring support and licensing costs.

Note: The above 5 phases are intentionally sequenced to allow for the Court, USDOJ and PRPD to review and assess options, probability of success and to mitigate risk factors. Specifically, phase 3 is intended to develop a comprehensive plan that not only includes technology in the solution but also the impact to PRPD staff currently performing support functions in both time keeping and IT maintenance. Rigor in this phase must also explain the benefits of proceeding with step 4.